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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL RICHARD LYNCH AND  
STEPHEN KEITH CHAMBERLAIN

Defendants.

CASE NO. 3:18-cr-00577-CRB

~~PROPOSED~~ ORDER GRANTING  
DEFENDANT STEPHEN  
CHAMBERLAIN'S MOTIONS FOR  
ISSUANCE OF RULE 17 SUBPOENAS  
AND LETTERS ROGATORY (ECF  
NOS. 81 & 87)

Date: December 1, 2021

Time: 1:30 p.m.

Crtrm.: 6

Assigned to Hon. Charles R. Brever

~~[PROPOSED]~~ ORDER

Good cause having been shown, the Court GRANTS Defendant Stephen Chamberlain's Motion for Issuance of Subpoenas Pursuant to Federal Rule of Criminal Procedure 17(c) and Letters Rogatory Pursuant to 28 U.S.C. § 1781 Relating to Daud Khan and Paul Morland (ECF No. 81); and Motion for Issuance of Subpoenas to Reena Prasad, Percy Tejada, and Ganesh Vaidyanathan Pursuant to Federal Rule of Criminal Procedure 17(c) (ECF No. 87).


The Court HEREBY ISSUES the subpoenas and letters rogatory attached to this order.

The Court ORDERS the Clerk of the Court to transmit the letters rogatory (Exhibits 10 through 12) along with a copy of the Second Superseding Indictment, via both registered mail and email to the U.K. Central Authority at the following address:

UK Central Authority  
International Criminality Unit  
Home Office  
3rd Floor Seacole Building  
2 Marsham Street  
London SW1P 4DF  
UKCA-ILOR@homeoffice.gov.uk

The Court further ORDERS the Clerk of the Court to notify counsel of record when the letters rogatory have been transmitted, and to promptly advise counsel of record of any response received.

DATED: December 1, 2021

  
\_\_\_\_\_  
Honorable Charles R. Breyer  
United States District Court Judge  
Northern District of California

# Exhibit 1

## UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

SUBPOENA TO PRODUCE  
DOCUMENTS OR OBJECTS  
IN A CRIMINAL CASE

Case No.: 3:18-cr-00577-CRB

Michael Richard Lynch and Stephen Keith Chamberlain,

Defendant(s).

TO: Reena Prasad

YOU ARE COMMANDED to produce at the place, date, and time specified the document(s) or object(s) indicated below. If compliance would be unreasonable or oppressive, you may file a motion requesting the court to quash or modify the subpoena, to review the documents in camera, or to permit production only pursuant to a protective order.

## PLACE

<input checked="" type="checkbox"/> U.S. Courthouse 450 Golden Gate Ave. San Francisco, CA 94102	<input type="checkbox"/> U.S. Courthouse 280 South First St. San Jose, CA 95113	<input type="checkbox"/> U.S. Courthouse 3140 Boeing Ave. McKinleyville, CA 95519	<input type="checkbox"/> U.S. Courthouse 1301 Clay Street Oakland, CA 94612
--	---	---	---

## COURTROOM/JUDGE

6/Hon. Charles R.  
Breyer

## DATE AND TIME

45 days from receipt

*If the document(s) or object(s) are produced in advance of the date specified, either to the court in an envelope delivered to the clerk's office or to the issuing attorney whose name and address appears below, no appearance is necessary.*

The following document(s) or object(s) shall be produced:

**See Attachment 1**

NOTE: Subpoena forms requiring the appearance of a witness to testify at a criminal proceeding or to testify and bring documents to a criminal proceeding, must use Form CAND 89A, *Subpoena to Testify in a Criminal Case*) or for the production of state law enforcement personnel or complaint records (CAND 89C, *Subpoena to Produce State Law Enforcement Personnel Or Complaint Records in a Criminal Case*) are available at the Court's website: [cand.uscourts.gov](http://cand.uscourts.gov).

U.S. MAGISTRATE JUDGE OR CLERK OF COURT

DATE

(By) Deputy Clerk

ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

Gary S. Lincenberg; Bird Marella Boxer Wolpert Nessim Dooks Lincenberg & Rhow PC; 1875 Century Park East,  
23rd Floor, Los Angeles, CA 90067-2561; (310) 201-2100; [glinenberg@birdmarella.com](mailto:glinenberg@birdmarella.com)

<b>PROOF OF SERVICE</b>		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		FEES AND MILEAGE TENDERED TO WITNESS  <input type="checkbox"/> YES <input type="checkbox"/> NO   AMOUNT
SERVED BY (PRINT NAME)		TITLE
<b>DECLARATION OF SERVER</b>		
<p>I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.</p> <p>Executed on _____</p> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="width: 45%; text-align: center;">DATE</div> <div style="width: 45%; text-align: center;">SIGNATURE OF SERVER</div> </div> <div style="text-align: center; margin-top: 10px;">ADDRESS:</div>		
<b>ADDITIONAL INFORMATION</b>		

**ATTACHMENT 1**

**Within 45 days of receiving this subpoena**, please produce the materials described below to the chambers of Judge Charles R. Breyer, U.S. Courthouse, 450 Golden Gate Ave, San Francisco, CA 94102.

1. Written communications from March 1, 2009 through December 31, 2010, including but not limited to emails, text messages, and messages on chat applications and/or social media platforms, relating to Autonomy Corporation PLC (“Autonomy”) and/or Stephen Chamberlain, between you and (a) Matthew Stephan, (b) Percy Tejada, (c) Ganesh Vaidyanathan, and/or (d) Brent Hogenson.
2. Written communications relating to your testimony before the Grand Jury on November 1, 2018.
3. Personal records of phone calls between you and Matthew Stephan, Percy Tejada, Ganesh Vaidyanathan and/or Brent Hogenson from July 1, 2010 through August 31, 2010.
4. Any personal notes, memoranda, journal entries, or other documents in your possession, custody or control concerning Stephen Chamberlain.

# Exhibit 2

## UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

SUBPOENA TO PRODUCE  
DOCUMENTS OR OBJECTS  
IN A CRIMINAL CASE

Case No.: 3:18-cr-00577-CRB

Michael Richard Lynch and Stephen Keith Chamberlain,

Defendant(s).

TO: Percy Tejada

YOU ARE COMMANDED to produce at the place, date, and time specified the document(s) or object(s) indicated below. If compliance would be unreasonable or oppressive, you may file a motion requesting the court to quash or modify the subpoena, to review the documents in camera, or to permit production only pursuant to a protective order.

## PLACE

<input checked="" type="checkbox"/> U.S. Courthouse 450 Golden Gate Ave. San Francisco, CA 94102	<input type="checkbox"/> U.S. Courthouse 280 South First St. San Jose, CA 95113	<input type="checkbox"/> U.S. Courthouse 3140 Boeing Ave. McKinleyville, CA 95519	<input type="checkbox"/> U.S. Courthouse 1301 Clay Street Oakland, CA 94612
--	---	---	---

## COURTROOM/JUDGE

6/Hon. Charles R.  
Breyer

## DATE AND TIME

45 days from receipt

*If the document(s) or object(s) are produced in advance of the date specified, either to the court in an envelope delivered to the clerk's office or to the issuing attorney whose name and address appears below, no appearance is necessary.*

The following document(s) or object(s) shall be produced:

**See Attachment 1**

NOTE: Subpoena forms requiring the appearance of a witness to testify at a criminal proceeding or to testify and bring documents to a criminal proceeding, must use Form CAND 89A, *Subpoena to Testify in a Criminal Case*) or for the production of state law enforcement personnel or complaint records (CAND 89C, *Subpoena to Produce State Law Enforcement Personnel Or Complaint Records in a Criminal Case*) are available at the Court's website: [cand.uscourts.gov](http://cand.uscourts.gov).

U.S. MAGISTRATE JUDGE OR CLERK OF COURT

DATE

(By) Deputy Clerk

ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

Gary S. Lincenberg; Bird Marella Boxer Wolpert Nessim Dooks Lincenberg & Rhov PC; 1875 Century Park East,  
23rd Floor, Los Angeles, CA 90067-2561; (310) 201-2100; [glinenberg@birdmarella.com](mailto:glinenberg@birdmarella.com)



<b>PROOF OF SERVICE</b>		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		FEES AND MILEAGE TENDERED TO WITNESS  <input type="checkbox"/> YES <input type="checkbox"/> NO   AMOUNT
SERVED BY (PRINT NAME)		TITLE
<b>DECLARATION OF SERVER</b>		
<p>I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.</p> <p>Executed on _____</p> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="width: 45%; text-align: center;">DATE</div> <div style="width: 45%; text-align: center;">SIGNATURE OF SERVER</div> </div> <div style="text-align: center; margin-top: 10px;">ADDRESS:</div>		
<b>ADDITIONAL INFORMATION</b>		

**ATTACHMENT 1**

**Within 45 days of receiving this subpoena**, please produce the materials described below to the chambers of Judge Charles R. Breyer, U.S. Courthouse, 450 Golden Gate Ave, San Francisco, CA 94102.

1. Written communications from March 1, 2009 through December 31, 2010, including but not limited to emails, text messages, and messages on chat applications and/or social media platforms, relating to Autonomy Corporation PLC (“Autonomy”) and/or Stephen Chamberlain, between you and (a) Reena Prasad, (b) Matthew Stephan, (c) Ganesh Vaidyanathan, and/or (d) Brent Hogenson.
2. Written communications relating to your testimony before the Grand Jury on November 1, 2018.
3. Personal records of phone calls between you and Reena Prasad, Matthew Stephan, Ganesh Vaidyanathan and/or Brent Hogenson from July 1, 2010 through August 31, 2010.
4. Any personal notes, memoranda, journal entries, or other documents in your possession, custody or control concerning Stephen Chamberlain.

# Exhibit 3

## UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

SUBPOENA TO PRODUCE  
DOCUMENTS OR OBJECTS  
IN A CRIMINAL CASE

Case No.: 3:18-cr-00577-CRB

Michael Richard Lynch and Stephen Keith Chamberlain,

Defendant(s).

TO: Ganesh Vaidyanathan

YOU ARE COMMANDED to produce at the place, date, and time specified the document(s) or object(s) indicated below. If compliance would be unreasonable or oppressive, you may file a motion requesting the court to quash or modify the subpoena, to review the documents in camera, or to permit production only pursuant to a protective order.

## PLACE

<input checked="" type="checkbox"/> U.S. Courthouse 450 Golden Gate Ave. San Francisco, CA 94102	<input type="checkbox"/> U.S. Courthouse 280 South First St. San Jose, CA 95113	<input type="checkbox"/> U.S. Courthouse 3140 Boeing Ave. McKinleyville, CA 95519	<input type="checkbox"/> U.S. Courthouse 1301 Clay Street Oakland, CA 94612
--	---	---	---

## COURTROOM/JUDGE

6/Hon. Charles R.  
Breyer

## DATE AND TIME

45 days from receipt

*If the document(s) or object(s) are produced in advance of the date specified, either to the court in an envelope delivered to the clerk's office or to the issuing attorney whose name and address appears below, no appearance is necessary.*

The following document(s) or object(s) shall be produced:

**See Attachment 1**

NOTE: Subpoena forms requiring the appearance of a witness to testify at a criminal proceeding or to testify and bring documents to a criminal proceeding, must use Form CAND 89A, *Subpoena to Testify in a Criminal Case*) or for the production of state law enforcement personnel or complaint records (CAND 89C, *Subpoena to Produce State Law Enforcement Personnel Or Complaint Records in a Criminal Case*) are available at the Court's website: [cand.uscourts.gov](http://cand.uscourts.gov).

U.S. MAGISTRATE JUDGE OR CLERK OF COURT

DATE

(By) Deputy Clerk

ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

Gary S. Lincenberg; Bird Marella Boxer Wolpert Nessim Drooks Lincenberg & Rhow PC; 1875 Century Park East, 23rd Floor, Los Angeles, CA 90067-2561; (310) 201-2100; [glincenberg@birdmarella.com](mailto:glincenberg@birdmarella.com)

<b>PROOF OF SERVICE</b>		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		FEES AND MILEAGE TENDERED TO WITNESS  <input type="checkbox"/> YES <input type="checkbox"/> NO   AMOUNT \$
SERVED BY (PRINT NAME)		TITLE
<b>DECLARATION OF SERVER</b>		
<p>I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.</p> <p>Executed on _____</p> <div style="display: flex; justify-content: space-between; margin-top: 20px;"> <div style="width: 45%; text-align: center;"> <p>DATE</p> </div> <div style="width: 50%;"> <p>SIGNATURE OF SERVER</p> <p>ADDRESS</p> </div> </div>		
<b>ADDITIONAL INFORMATION</b>		

**ATTACHMENT 1**

**Within 45 days of receiving this subpoena**, please produce the materials described below to the chambers of Judge Charles R. Breyer, U.S. Courthouse, 450 Golden Gate Ave, San Francisco, CA 94102.

1. Written communications from March 1, 2009 through December 31, 2010, including but not limited to emails, text messages, and messages on chat applications and/or social media platforms, relating to Autonomy Corporation PLC (“Autonomy”) and/or Stephen Chamberlain, between you and (a) Reena Prasad, (b) Matthew Stephan, (c) Percy Tejeda, and/or (d) Brent Hogenson.
2. Written communications relating to your testimony before the Grand Jury on November 1, 2018.
3. Personal records of phone calls between you and Reena Prasad, Matthew Stephan, Percy Tejeda, and/or Brent Hogenson from July 1, 2010 through August 31, 2010.
4. Any personal notes, memoranda, journal entries, or other documents in your possession, custody or control concerning Stephen Chamberlain.

# Exhibit 4

## UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

STEPHEN K. CHAMBERLAIN

Defendant(s).

SUBPOENA TO PRODUCE  
DOCUMENTS OR OBJECTS  
IN A CRIMINAL CASE

Case No.: 3:18-cr-00577-CR

TO: Hafeez Bux Daud Khan

YOU ARE COMMANDED to produce at the place, date, and time specified the document(s) or object(s) indicated below. If compliance would be unreasonable or oppressive, you may file a motion requesting the court to quash or modify the subpoena, to review the documents in camera, or to permit production only pursuant to a protective order.

## PLACE

<input checked="" type="checkbox"/> U.S. Courthouse 450 Golden Gate Ave. San Francisco, CA 94102	<input type="checkbox"/> U.S. Courthouse 280 South First St. San Jose, CA 95113	<input type="checkbox"/> U.S. Courthouse 3140 Boeing Ave. McKinleyville, CA 95519	<input type="checkbox"/> U.S. Courthouse 1301 Clay Street Oakland, CA 94612
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COURTROOM/JUDGE  
6/BreyerDATE AND TIME  
45 days from receipt

*If the document(s) or object(s) are produced in advance of the date specified, either to the court in an envelope delivered to the clerk's office or to the issuing attorney whose name and address appears below, no appearance is necessary.*

The following document(s) or object(s) shall be produced:

All records and communications in the possession of Hafeez Bux Daud Khan relating to Autonomy, Mr. Stephen Chamberlain, or Dr. Michael Lynch, including but not limited to, electronic or hard copy documents, hand-written notes, reports (and drafts thereof), emails (including emails sent or received by Daud.Khan@gmail.com), chat messages, text messages, social media account communications, voicemails and audio recordings.

NOTE: Subpoena forms requiring the appearance of a witness to testify at a criminal proceeding or to testify and bring documents to a criminal proceeding, must use Form CAND 89A, *Subpoena to Testify in a Criminal Case*) or for the production of state law enforcement personnel or complaint records (CAND 89C, *Subpoena to Produce State Law Enforcement Personnel Or Complaint Records in a Criminal Case*) are available at the Court's website: [cand.uscourts.gov](http://cand.uscourts.gov).

U.S. MAGISTRATE JUDGE OR CLERK OF COURT

DATE

(By) Deputy Clerk

ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

Gary S. Lincenberg  
Bird, Marella, Boxer, Wolpert, Nessim, Drooks, Lincenberg & Rhow, PC.  
1875 Century Park East, 23rd Floor, Los Angeles, CA 90067-2561  
310-201-2100



CAND 89B (Rev. 6/17) Subpoena to Produce Documents or Objects in a Criminal Case

<b>PROOF OF SERVICE</b>		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		FEES AND MILEAGE TENDERED TO WITNESS  <input type="checkbox"/> YES <input type="checkbox"/> NO   AMOUNT \$
SERVED BY (PRINT NAME)		TITLE
<b>DECLARATION OF SERVER</b>		
<p>I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.</p> <p>Executed on _____ DATE _____ SIGNATURE OF SERVER _____</p> <p style="text-align: right;">ADDRESS: _____</p>		
<b>ADDITIONAL INFORMATION</b>		

# Exhibit 5

## UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

STEPHEN K. CHAMBERLAIN

Defendant(s).

SUBPOENA TO PRODUCE  
DOCUMENTS OR OBJECTS  
IN A CRIMINAL CASE

Case No.: 3:18-cr-00577-CR

TO: JP Morgan Chase Bank, N.A

YOU ARE COMMANDED to produce at the place, date, and time specified the document(s) or object(s) indicated below. If compliance would be unreasonable or oppressive, you may file a motion requesting the court to quash or modify the subpoena, to review the documents in camera, or to permit production only pursuant to a protective order.

## PLACE

<input checked="" type="checkbox"/> U.S. Courthouse 450 Golden Gate Ave. San Francisco, CA 94102	<input type="checkbox"/> U.S. Courthouse 280 South First St. San Jose, CA 95113	<input type="checkbox"/> U.S. Courthouse 3140 Boeing Ave. McKinleyville, CA 95519	<input type="checkbox"/> U.S. Courthouse 1301 Clay Street Oakland, CA 94612
--	---	---	---

COURTROOM/JUDGE  
6/BreyerDATE AND TIME  
45 days from receipt

*If the document(s) or object(s) are produced in advance of the date specified, either to the court in an envelope delivered to the clerk's office or to the issuing attorney whose name and address appears below, no appearance is necessary.*

The following document(s) or object(s) shall be produced:

All communications and documents, in hard copy or electronic form, generated by or sent to Mr. Daud Khan, relating to Autonomy, Mr. Stephen Chamberlain, or Dr. Michael Lynch, including but not limited to chat messages or transcripts, emails (including from daud.khan@cazenove.com, Daud.Khan@jpmorgan.com and Daud.Khan@JPMResearchmail.com), instant messages, Bloomberg communications (including from DKHAN5@Bloomberg.net), voicemails, audio recordings, hand-written notes, and reports (or drafts thereof).

NOTE: Subpoena forms requiring the appearance of a witness to testify at a criminal proceeding or to testify and bring documents to a criminal proceeding, must use Form CAND 89A, *Subpoena to Testify in a Criminal Case* or for the production of state law enforcement personnel or complaint records (CAND 89C, *Subpoena to Produce State Law Enforcement Personnel Or Complaint Records in a Criminal Case*) are available at the Court's website: [cand.uscourts.gov](http://cand.uscourts.gov).

U.S. MAGISTRATE JUDGE OR CLERK OF COURT

DATE

(By) Deputy Clerk

ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

Gary S. Lincenberg  
Bird, Marella, Boxer, Wolpert, Nessim, Drooks, Lincenberg & Rhow, PC.  
1875 Century Park East, 23rd Floor, Los Angeles, CA 90067-2561  
310-201-2100

CAND 89B (Rev. 6/17) Subpoena to Produce Documents or Objects in a Criminal Case

<b>PROOF OF SERVICE</b>		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		FEES AND MILEAGE TENDERED TO WITNESS  <input type="checkbox"/> YES <input type="checkbox"/> NO    AMOUNT \$
SERVED BY (PRINT NAME)		TITLE
<b>DECLARATION OF SERVER</b>		
<p>I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.</p> <p>Executed on _____  <div style="display: flex; justify-content: space-between; width: 100%;"> <span>DATE</span> <span>SIGNATURE OF SERVER</span> </div> </p> <p style="text-align: right;">ADDRESS:</p>		
<b>ADDITIONAL INFORMATION</b>		

# Exhibit 6

## UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

STEPHEN K. CHAMBERLAIN

Defendant(s).

SUBPOENA TO PRODUCE  
DOCUMENTS OR OBJECTS  
IN A CRIMINAL CASE

Case No.: 3:18-cr-00577-CR

TO: Joh. Berenberg, Gossler &amp; Co. KG

YOU ARE COMMANDED to produce at the place, date, and time specified the document(s) or object(s) indicated below. If compliance would be unreasonable or oppressive, you may file a motion requesting the court to quash or modify the subpoena, to review the documents in camera, or to permit production only pursuant to a protective order.

## PLACE

<input checked="" type="checkbox"/> U.S. Courthouse 450 Golden Gate Ave. San Francisco, CA 94102	<input type="checkbox"/> U.S. Courthouse 280 South First St. San Jose, CA 95113	<input type="checkbox"/> U.S. Courthouse 3140 Boeing Ave. McKinleyville, CA 95519	<input type="checkbox"/> U.S. Courthouse 1301 Clay Street Oakland, CA 94612
--	---	---	---

COURTROOM/JUDGE  
6/BreyerDATE AND TIME  
45 days from receipt

*If the document(s) or object(s) are produced in advance of the date specified, either to the court in an envelope delivered to the clerk's office or to the issuing attorney whose name and address appears below, no appearance is necessary.*

The following document(s) or object(s) shall be produced:

All communications and documents, in hard copy or electronic form, generated by or sent to Mr. Daud Khan, relating to Autonomy, Mr. Stephen Chamberlain, or Dr. Michael Lynch, including but not limited to chat messages or transcripts, emails, text messages, Bloomberg communications, voicemails, audio recordings, hand-written notes, and reports (or drafts thereof).

NOTE: Subpoena forms requiring the appearance of a witness to testify at a criminal proceeding or to testify and bring documents to a criminal proceeding, must use Form CAND 89A, *Subpoena to Testify in a Criminal Case*) or for the production of state law enforcement personnel or complaint records (CAND 89C, *Subpoena to Produce State Law Enforcement Personnel Or Complaint Records in a Criminal Case*) are available at the Court's website: [cand.uscourts.gov](http://cand.uscourts.gov).

U.S. MAGISTRATE JUDGE OR CLERK OF COURT

DATE

(By) Deputy Clerk

ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

Gary S. Lincenberg  
Bird, Marella, Boxer, Wolpert, Nessim, Drooks, Lincenberg & Rhaw, PC.  
1875 Century Park East, 23rd Floor, Los Angeles, CA 90067-2561  
310-201-2100

CAND 89B (Rev. 6/17) Subpoena to Produce Documents or Objects in a Criminal Case

<b>PROOF OF SERVICE</b>		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		FEES AND MILEAGE TENDERED TO WITNESS  <input type="checkbox"/> YES <input type="checkbox"/> NO    AMOUNT \$
SERVED BY (PRINT NAME)		TITLE
<b>DECLARATION OF SERVER</b>		
<p>I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.</p> <p>Executed on _____ DATE _____ SIGNATURE OF SERVER _____</p> <p style="text-align: right;">ADDRESS: _____</p>		
<b>ADDITIONAL INFORMATION</b>		

# Exhibit 7



## UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

STEPHEN K. CHAMBERLAIN

Defendant(s).

SUBPOENA TO PRODUCE  
DOCUMENTS OR OBJECTS  
IN A CRIMINAL CASE

Case No.: 3:18-cr-00577-CR

TO: Paul Gilmer Morland

YOU ARE COMMANDED to produce at the place, date, and time specified the document(s) or object(s) indicated below. If compliance would be unreasonable or oppressive, you may file a motion requesting the court to quash or modify the subpoena, to review the documents in camera, or to permit production only pursuant to a protective order.

## PLACE

<input checked="" type="checkbox"/> U.S. Courthouse 450 Golden Gate Ave. San Francisco, CA 94102	<input type="checkbox"/> U.S. Courthouse 280 South First St. San Jose, CA 95113	<input type="checkbox"/> U.S. Courthouse 3140 Boeing Ave. McKinleyville, CA 95519	<input type="checkbox"/> U.S. Courthouse 1301 Clay Street Oakland, CA 94612
--	---	---	---

COURTROOM/JUDGE  
6/BreyerDATE AND TIME  
45 days from receipt

*If the document(s) or object(s) are produced in advance of the date specified, either to the court in an envelope delivered to the clerk's office or to the issuing attorney whose name and address appears below, no appearance is necessary.*

The following document(s) or object(s) shall be produced:

All records and communications in the possession of Paul Morland relating to Autonomy, Mr. Stephen Chamberlain, or Dr. Michael Lynch, including but not limited to, electronic or hard copy documents, hand-written notes, reports (and drafts thereof), emails, chat messages, text messages, social media account communications, voicemails and audio recordings.

NOTE: Subpoena forms requiring the appearance of a witness to testify at a criminal proceeding or to testify and bring documents to a criminal proceeding, must use Form CAND 89A, *Subpoena to Testify in a Criminal Case* or for the production of state law enforcement personnel or complaint records (CAND 89C, *Subpoena to Produce State Law Enforcement Personnel Or Complaint Records in a Criminal Case*) are available at the Court's website: [cand.uscourts.gov](http://cand.uscourts.gov).

U.S. MAGISTRATE JUDGE OR CLERK OF COURT

DATE

(By) Deputy Clerk

ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

Gary S. Lincenberg  
Bird, Marella, Boxer, Wolpert, Nessim, Drooks, Lincenberg & Rhew, PC.  
187s5 Century Park East, 23rd Floor, Los Angeles, CA 90067-2561  
310-201-2100

CAND 89B (Rev. 6/17) Subpoena to Produce Documents or Objects in a Criminal Case

<b>PROOF OF SERVICE</b>		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		FEES AND MILEAGE TENDERED TO WITNESS  <input type="checkbox"/> YES <input type="checkbox"/> NO   AMOUNT \$
SERVED BY (PRINT NAME)		TITLE
<b>DECLARATION OF SERVER</b>		
<p>I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.</p> <p>Executed on _____ DATE _____ SIGNATURE OF SERVER _____</p> <p style="text-align: right;">ADDRESS: _____</p>		
<p><b>ADDITIONAL INFORMATION</b></p>		

# Exhibit 8

## UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

STEPHEN K. CHAMBERLAIN

Defendant(s).

SUBPOENA TO PRODUCE  
DOCUMENTS OR OBJECTS  
IN A CRIMINAL CASE

Case No.: 3:18-cr-00577-CR

TO: Northland Capital Partners Limited (previously known as Astaire Securities)

YOU ARE COMMANDED to produce at the place, date, and time specified the document(s) or object(s) indicated below. If compliance would be unreasonable or oppressive, you may file a motion requesting the court to quash or modify the subpoena, to review the documents in camera, or to permit production only pursuant to a protective order.

## PLACE

<input checked="" type="checkbox"/> U.S. Courthouse 450 Golden Gate Ave. San Francisco, CA 94102	<input type="checkbox"/> U.S. Courthouse 280 South First St. San Jose, CA 95113	<input type="checkbox"/> U.S. Courthouse 3140 Boeing Ave. McKinleyville, CA 95519	<input type="checkbox"/> U.S. Courthouse 1301 Clay Street Oakland, CA 94612
--	---	---	---

COURTROOM/JUDGE  
6/BreyerDATE AND TIME  
45 days from receipt

*If the document(s) or object(s) are produced in advance of the date specified, either to the court in an envelope delivered to the clerk's office or to the issuing attorney whose name and address appears below, no appearance is necessary.*

The following document(s) or object(s) shall be produced:

All communications and documents, in hard copy or electronic form, including but not limited to instant messages, texts, emails, voicemails, hand-written notes, reports (including drafts thereof), or audio recordings, generated by or sent to Paul Morland, relating to Autonomy, Mr. Stephen Chamberlain, or Dr. Michael Lynch.

NOTE: Subpoena forms requiring the appearance of a witness to testify at a criminal proceeding or to testify and bring documents to a criminal proceeding, must use Form CAND 89A, *Subpoena to Testify in a Criminal Case* or for the production of state law enforcement personnel or complaint records (CAND 89C, *Subpoena to Produce State Law Enforcement Personnel Or Complaint Records in a Criminal Case*) are available at the Court's website: [cand.uscourts.gov](http://cand.uscourts.gov).

U.S. MAGISTRATE JUDGE OR CLERK OF COURT

DATE

(By) Deputy Clerk

ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

Gary S. Lincenberg  
Bird, Marella, Boxer, Wolpert, Nessim, Drooks, Lincenberg & Rhow, PC.  
1875 Century Park East, 23rd Floor, Los Angeles, CA 90067-2561  
310-201-2100

CAND 89B (Rev. 6/17) Subpoena to Produce Documents or Objects in a Criminal Case

<b>PROOF OF SERVICE</b>		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		FEES AND MILEAGE TENDERED TO WITNESS  <input type="checkbox"/> YES <input type="checkbox"/> NO   AMOUNT \$
SERVED BY (PRINT NAME)		TITLE
<b>DECLARATION OF SERVER</b>		
<p>I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.</p> <p>Executed on _____ DATE _____ SIGNATURE OF SERVER _____</p> <p style="text-align: right;">ADDRESS: _____</p>		
<p><b>ADDITIONAL INFORMATION</b></p>		

# Exhibit 9

## UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

STEPHEN K. CHAMBERLAIN

Defendant(s).

SUBPOENA TO PRODUCE  
DOCUMENTS OR OBJECTS  
IN A CRIMINAL CASE

Case No.: 3:18-cr-00577-CR

TO: Peel Hunt LLP

YOU ARE COMMANDED to produce at the place, date, and time specified the document(s) or object(s) indicated below. If compliance would be unreasonable or oppressive, you may file a motion requesting the court to quash or modify the subpoena, to review the documents in camera, or to permit production only pursuant to a protective order.

PLACE				COURTROOM/JUDGE
<input checked="" type="checkbox"/> U.S. Courthouse	<input type="checkbox"/> U.S. Courthouse	<input type="checkbox"/> U.S. Courthouse	<input type="checkbox"/> U.S. Courthouse	6/Breyer
450 Golden Gate Ave.	280 South First St.	3140 Boeing Ave.	1301 Clay Street	DATE AND TIME
San Francisco, CA 94102	San Jose, CA 95113	McKinleyville, CA 95519	Oakland, CA 94612	45 days from receipt

*If the document(s) or object(s) are produced in advance of the date specified, either to the court in an envelope delivered to the clerk's office or to the issuing attorney whose name and address appears below, no appearance is necessary.*

The following document(s) or object(s) shall be produced:

All communications and documents, in hard copy or electronic form, generated by or sent to Mr. Paul Morland, relating to Autonomy, Mr. Stephen Chamberlain, or Dr. Michael Lynch, including but not limited to chat messages or transcripts, emails, instant messages, texts, voicemails, hand-written notes, audio recordings, and reports (or drafts thereof).

NOTE: Subpoena forms requiring the appearance of a witness to testify at a criminal proceeding or to testify and bring documents to a criminal proceeding, must use Form CAND 89A, *Subpoena to Testify in a Criminal Case*) or for the production of state law enforcement personnel or complaint records (CAND 89C, *Subpoena to Produce State Law Enforcement Personnel Or Complaint Records in a Criminal Case*) are available at the Court's website: [cand.uscourts.gov](http://cand.uscourts.gov).

U.S. MAGISTRATE JUDGE OR CLERK OF COURT	DATE
(By) Deputy Clerk	

ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

Gary S. Lincenberg  
Bird, Marella, Boxer, Wolpert, Nessim, Drooks, Lincenberg & Rhow, PC.  
1875 Century Park East, 23rd Floor, Los Angeles, CA 90067-2561  
310-201-2100

CAND 89B (Rev. 6/17) Subpoena to Produce Documents or Objects in a Criminal Case

<b>PROOF OF SERVICE</b>		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		FEES AND MILEAGE TENDERED TO WITNESS  <input type="checkbox"/> YES <input type="checkbox"/> NO   AMOUNT \$
SERVED BY (PRINT NAME)		TITLE
<b>DECLARATION OF SERVER</b>		
<p>I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.</p> <p>Executed on _____ DATE _____ SIGNATURE OF SERVER _____</p> <p style="text-align: right;">ADDRESS: _____</p>		
<b>ADDITIONAL INFORMATION</b>		



# Exhibit 10

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8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 MICHAEL RICHARD LYNCH AND  
15 STEPHEN KEITH CHAMBERLAIN

16 Defendants.

CASE NO. 3:18-cr-00577-CRB

~~PROPOSED~~ LETTER  
ROGATORY TO THE UNITED  
KINGDOM, CENTRAL  
AUTHORITY, INTERNATIONAL  
CRIMINALITY UNIT, HOME  
OFFICE REQUESTING  
MATERIALS FROM DAUD KHAN

Assigned to Hon. Charles R. Brever

1 The Honorable Charles R. Breyer, United States District Court Judge of the  
 2 United States District Court for the Northern District of California, presents his  
 3 compliments to the UK Central Authority, International Criminality Unit, Home  
 4 Office and requests international assistance, pursuant to the Mutual Legal  
 5 Assistance Treaty between the United States and the United Kingdom of Great  
 6 Britain and Northern Ireland, to obtain evidence to be used in a criminal proceeding  
 7 before this Court in the above-captioned matter.

8 This Court requests the assistance described herein as necessary in the  
 9 interests of justice and for the purpose of a full and fair trial. The assistance  
 10 requested is that the UK Central Authority compel Hafeez Bux Daud Khan to  
 11 produce the documents identified below.

## 12 **I. FACTUAL BACKGROUND**

13 This request relates to a criminal case brought against Stephen Chamberlain  
 14 by the United States of America in the Northern District of California. The Second  
 15 Superseding Indictment (“SI”) alleges that Mr. Chamberlain, Dr. Michael Lynch,  
 16 and others defrauded purchasers and sellers of Autonomy securities, including,  
 17 specifically, Hewlett-Packard Company (“HP”) in connection with its purchase of  
 18 Autonomy Corporation plc (“Autonomy”) in August 2011. Mr. Chamberlain is  
 19 charged with, inter alia, wire and securities fraud, and conspiracy to commit the  
 20 same, in violation of 18 U.S.C. §§ 1343, 1348, and 1349. He is also separately  
 21 charged with a multi-object conspiracy to conceal the alleged fraud, in violation of  
 22 18 U.S.C. § 371. The case against Mr. Chamberlain is in pretrial proceedings at  
 23 present. This Letter Rogatory stems from a request by counsel for Mr. Chamberlain  
 24 for materials which this Court has found are relevant and material for his defense at  
 25 trial and requested in the interests of justice. The charges against Mr. Chamberlain  
 26 rely in part on the testimony of Mr. Khan, a former securities analyst who covered  
 27 Autonomy, and who has previously testified in related proceedings, including  
 28 United States v. Hussain, No. CR 16-462 CRB (Northern District of California), and

1 Autonomy Corp. Ltd. v. Lynch, Claim No. HC-2015-001324 (High Court of Justice,  
 2 Chancery Division, London, U.K.). Mr. Khan has testified that Autonomy’s senior  
 3 management misled him and other market participants regarding Autonomy’s  
 4 finances and products. The SI alleges that analysts such as Mr. Khan relied on  
 5 Autonomy’s financial statements that Mr. Chamberlain helped to prepare, and that  
 6 Mr. Chamberlain presented deceptive information regarding Autonomy’s (i)  
 7 revenue from hardware sales; (ii) Original Equipment Manufacturer (“OEM”)  
 8 revenue; and (iii) cost allocation relating to the launch of its new Structured  
 9 Probabilistic Engine (“SPE”) product in Q3 2009, among other things. Mr. Khan has  
 10 claimed that this inflated financial information led to an inflated share price.

11 The record as of now is materially incomplete, as Mr. Chamberlain currently  
 12 has access to only a limited set of Mr. Khan’s relevant communications. As such, it  
 13 will be critical for Mr. Chamberlain to receive additional evidence from Mr. Khan in  
 14 order establish that, contrary to Mr. Khan’s testimony, he was not deceived and that  
 15 there was no fraudulent scheme.

## 16 **II. RECIPROCITY**

17 The United States District Court for the Northern District of California  
 18 expresses its willingness to provide similar assistance to authorities of the United  
 19 Kingdom of Great Britain and Northern Ireland, should the need arise, and to the  
 20 extent permissible by law.

## 21 **III. REIMBURSEMENT FOR COSTS**

22 The United States District Court for the Northern District of California  
 23 assures the Central Authority that Mr. Chamberlain stands ready to reimburse the  
 24 authorities of the United Kingdom of Great Britain and Northern Ireland for any  
 25 costs incurred in executing the requesting court’s letters rogatory.


## 26 **IV. EVIDENCE TO BE OBTAINED**

27 This request is directed to Hafeez Bux Daud Khan’s (“Daud Khan”), Flat B,  
 28 19 Chetwode Road, London SW17 7RF, for the production of the materials

1 identified below:

2 1. All records and communications in the possession, custody, or control  
3 of Hafeez Bux Daud Khan relating to Autonomy, Mr. Stephen Chamberlain, or Dr.  
4 Michael Lynch, including but not limited to, electronic or hard copy documents,  
5 hand-written notes, reports (and drafts thereof), emails (including emails sent or  
6 received by Daud.Khan@gmail.com), chat messages, text messages, social media  
7 account communications, voicemails and audio recordings.

8  
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10  
11 DATED: December 1, 2021

  
12 Honorable Charles R. Breyer  
13 United States District Court Judge  
14 Northern District of California  
15 450 Golden Gate Avenue  
16 San Francisco, CA 94102  
17 [crbrd@cand.uscourts.gov](mailto:crbrd@cand.uscourts.gov)  
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# Exhibit 11

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8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 MICHAEL RICHARD LYNCH AND  
15 STEPHEN KEITH CHAMBERLAIN

16 Defendants.

CASE NO. 3:18-cr-00577-CRB

~~PROPOSED~~ LETTER  
ROGATORY TO THE UNITED  
KINGDOM, CENTRAL  
AUTHORITY, INTERNATIONAL  
CRIMINALITY UNIT, HOME  
OFFICE REQUESTING  
MATERIALS FROM PAUL  
MORLAND

Assigned to Hon. Charles R. Brever

1 The Honorable Charles R. Breyer, United States District Court Judge of the  
 2 United States District Court for the Northern District of California, presents his  
 3 compliments to the UK Central Authority, International Criminality Unit, Home  
 4 Office, and requests international assistance, pursuant to the Mutual Legal  
 5 Assistance Treaty between the United States and the United Kingdom of Great  
 6 Britain and Northern Ireland to obtain evidence to be used in a criminal proceeding  
 7 before this Court in the above-captioned matter.

8 This Court requests the assistance described herein as necessary in the  
 9 interests of justice and for the purpose of a full and fair trial. The assistance  
 10 requested is that the UK Central Authority compel Paul Gilmer Morland to produce  
 11 the documents identified below.

## 12 **I. FACTUAL BACKGROUND**

13 This request relates to a criminal case brought against Stephen Chamberlain  
 14 by the United States of America in the Northern District of California. The Second  
 15 Superseding Indictment ("SI") alleges that Mr. Chamberlain, Dr. Michael Lynch,  
 16 and others defrauded purchasers and sellers of Autonomy securities, including,  
 17 specifically, Hewlett-Packard Company ("HP") in connection with its purchase of  
 18 Autonomy Corporation plc ("Autonomy") in August 2011. Mr. Chamberlain is  
 19 charged with, inter alia, wire and securities fraud, and conspiracy to commit the  
 20 same, in violation of 18 U.S.C. §§ 1343, 1348, and 1349. He is also separately  
 21 charged with a multi-object conspiracy to conceal the Alleged fraud, in violation of  
 22 18 U.S.C. § 371. The case against Mr. Chamberlain is in pretrial proceedings at  
 23 present. This Letter Rogatory stems from a request by counsel for Mr. Chamberlain  
 24 for materials which this Court has found are relevant and material for his defense at  
 25 trial and requested in the interests of justice.

26 The charges against Mr. Chamberlain rely in part on the testimony of Mr.  
 27 Morland, a former securities analyst who covered Autonomy, and who has  
 28 previously testified in related proceedings, including United States v. Hussain, No.



1 CR 16-462 CRB (Northern District of California), and Autonomy Corp. Ltd. v.  
 2 Lynch, Claim No. HC-2015-001324 (High Court of Justice, Chancery Division,  
 3 London, U.K.). Mr. Morland has testified that Autonomy's senior management  
 4 misled him and other market participants regarding Autonomy's finances and  
 5 products. The SI alleges that analysts such as Mr. Morland relied on Autonomy's  
 6 financial statements that Mr. Chamberlain helped to prepare, and that Mr.  
 7 Chamberlain presented 1 deceptive information regarding Autonomy's (i) revenue  
 8 from hardware sales; (ii) Original Equipment Manufacturer ("OEM") revenue; and  
 9 (iii) cost allocation relating to the launch of its new Structured Probabilistic Engine  
 10 ("SPE") product in Q3 2009, among other things. Mr. Morland has claimed that this  
 11 inflated financial information led to an inflated share price.

12 The record as of now is materially incomplete, as Mr. Chamberlain currently  
 13 has access to only a limited set of Mr. Morland's relevant communications. As such,  
 14 it will be critical for Mr. Chamberlain to receive additional evidence from Mr.  
 15 Morland in order to establish that, contrary to Mr. Morland's testimony, he was not  
 16 deceived and that there was no fraudulent scheme.

## 17 **II. RECIPROCITY**

18 The United States District Court for the Northern District of California  
 19 expresses its willingness to provide similar assistance to authorities of the United  
 20 Kingdom of Great Britain and Northern Ireland, should the need arise, and to the  
 21 extent permissible by law.

## 22 **III. REIMBURSEMENT FOR COSTS**

23 The United States District Court for the Northern District of California  
 24 assures the UK Central Authority that Mr. Chamberlain stands ready to reimburse  
 25 the authorities of the United Kingdom of Great Britain and Northern Ireland for any  
 26 costs incurred in executing the requesting court's letters rogatory.

## 27 **IV. EVIDENCE TO BE OBTAINED**

28 This request is directed to Paul Gilmer Morland ("Paul Morland"), c/o

1 Alvarium Capital, 1st Floor, 10 Old Burlington Street, London, W1S 3AG, for the  
2 production of the documents identified below:

3 1. All records and communications in the possession, custody, or control  
4 of Paul Morland relating to Autonomy, Mr. Stephen Chamberlain, or Dr. Michael  
5 Lynch, including but not limited to, electronic or hard copy documents, hand-written  
6 notes, reports (and drafts thereof), emails, chat messages, text messages, social  
7 media account communications, voicemails and audio recordings.

8  
9  
10 DATED: December 1, 2021



Honorable Charles R. Breyer  
United States District Court Judge  
Northern District of California  
450 Golden Gate Avenue  
San Francisco, CA 94102  
[crberd@cand.uscourts.gov](mailto:crberd@cand.uscourts.gov)

# Exhibit 12

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8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**  
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11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 MICHAEL RICHARD LYNCH AND  
15 STEPHEN KEITH CHAMBERLAIN

16 Defendants.

CASE NO. 3:18-cr-00577-CRB

~~PROPOSED~~ LETTER  
ROGATORY TO THE UNITED  
KINGDOM, CENTRAL  
AUTHORITY, INTERNATIONAL  
CRIMINALITY UNIT, HOME  
OFFICE REQUESTING  
MATERIALS FROM NORTHLAND  
CAPITAL PARTNERS LIMITED

Assigned to Hon. Charles R. Brever

1 The Honorable Charles R. Breyer, United States District Court Judge of the  
 2 United States District Court for the Northern District of California, presents his  
 3 compliments to the UK Central Authority, International Criminality Unit, Home  
 4 Office and requests international assistance, pursuant to the Mutual Legal  
 5 Assistance Treaty between the United States and the United Kingdom of Great  
 6 Britain and Northern Ireland, to obtain evidence to be used in a criminal proceeding  
 7 before this Court in the above-captioned matter.

8 This Court requests the assistance described herein as necessary in the  
 9 interests of justice and for the purpose of a full and fair trial. The assistance  
 10 requested is that the UK Central Authority compel Northland Capital Partners  
 11 Limited (formerly Astaire Securities) to produce the materials identified below.

## 12 **I. FACTUAL BACKGROUND**

13 This request relates to a criminal case brought against Stephen Chamberlain  
 14 by the United States of America in the Northern District of California. The Second  
 15 Superseding Indictment (“SI”) alleges that Mr. Chamberlain, Dr. Michael Lynch,  
 16 and others defrauded purchasers and sellers of Autonomy securities, including,  
 17 specifically, Hewlett-Packard Company (“HP”) in connection with its purchase of  
 18 Autonomy Corporation plc (“Autonomy”) in August 2011. Mr. Chamberlain is  
 19 charged with, inter alia, wire and securities fraud, and conspiracy to commit the  
 20 same, in violation of 18 U.S.C. §§ 1343, 1348, and 1349. He is also separately  
 21 charged with a multi-object conspiracy to conceal the alleged fraud, in violation of  
 22 18 U.S.C. § 371. The case against Mr. Chamberlain is in pretrial proceedings at  
 23 present. This Letter Rogatory stems from a request by counsel for Mr. Chamberlain  
 24 for materials which this Court has found are relevant and material for his defense at  
 25 trial and requested in the interests of justice.

26 The charges against Mr. Chamberlain rely in part on the testimony of Mr.  
 27 Morland, a former securities analyst who covered Autonomy, and who has  
 28 previously testified in related proceedings, including *United States v. Hussain*, No.

1 CR 16-462 CRB (Northern District of California), and *Autonomy Corp. Ltd. v.*  
 2 *Lynch*, Claim No. HC-2015-001324 (High Court of Justice, Chancery Division,  
 3 London, U.K.). Mr. Morland has testified that Autonomy’s senior management  
 4 misled him and other market participants regarding Autonomy’s finances and  
 5 products. The SI alleges that analysts such as Mr. Morland relied on Autonomy’s  
 6 financial statements that Mr. Chamberlain helped to prepare, and that Mr.  
 7 Chamberlain presented deceptive information regarding Autonomy’s (i) revenue  
 8 from hardware sales; (ii) Original Equipment Manufacturer (“OEM”) revenue; and  
 9 (iii) cost allocation relating to the launch of its new Structured Probabilistic Engine  
 10 (“SPE”) product in Q3 2009, among other things. Mr. Morland has claimed that this  
 11 inflated financial information led to an inflated share price.

12 The record as of now is materially incomplete, as Mr. Chamberlain currently  
 13 has access to only a limited set of Mr. Morland’s relevant communications. As such,  
 14 it will be critical for Mr. Chamberlain to receive additional evidence from Mr.  
 15 Morland in order to establish that, contrary to Mr. Morland’s testimony, he was not  
 16 deceived and that there was no fraudulent scheme.

## 17 **II. RECIPROCITY**

18 The United States District Court for the Northern District of California  
 19 expresses its willingness to provide similar assistance to authorities of the United  
 20 Kingdom of Great Britain and Northern Ireland, should the need arise, and to the  
 21 extent permissible by law.

## 22 **III. REIMBURSEMENT FOR COSTS**

23 The United States District Court for the Northern District of California  
 24 assures the UK Central Authority that Mr. Chamberlain stands ready to reimburse  
 25 the authorities of the United Kingdom of Great Britain and Northern Ireland for any  
 26 costs incurred in executing the requesting court’s letters rogatory.

## 27 **IV. EVIDENCE TO BE OBTAINED**

28 Mr. Morland worked at Astaire Securities from July 2008 through October

1 2010, and reported on and communicated about Autonomy throughout his period of  
2 employment. Therefore, Mr. Morland's communications and documents from this  
3 period will be relevant to his coverage of Autonomy and to whether or not he was  
4 deceived.

5 This request is directed to Northland Capital Partners Limited (formerly  
6 Astaire Securities), Prince Fredrick House, 35-39 Maddox Street, London W1S 2PP,  
7 for the production of the materials identified below:

8 1. All communications and documents , in hard copy or electronic form,  
9 including but not limited to instant messages, texts, emails, voicemails, hand-written  
10 notes, reports (including drafts thereof), or audio recordings, generated by or sent to  
11 Paul Morland, relating to Autonomy, Mr. Stephen Chamberlain, or Dr. Michael  
12 Lynch.

13  
14  
15  
16  
17 DATED: December 1, 2021



Honorable Charles R. Breyer  
United States District Court Judge  
Northern District of California  
450 Golden Gate Avenue  
San Francisco, CA 94102  
[crbrd@cand.uscourts.gov](mailto:crbrd@cand.uscourts.gov)